

EXHIBIT 1

From: [Andrew S. Bruns](#)
To: [Alex Frawley](#); [KVP-OAI](#); [openaicopyrightlitigation.lwteam@lw.com](#); [OpenAICopyright@mofo.com](#)
Cc: [NYT-AI-SG-Service@simplelists.susmangodfrey.com](#); [dailynews-ai-rfem@rothwellfigg.com](#); [#NewYorkTimes-Microsoft-FDBR](#); [NewYorkTimes_Microsoft_OHS@orrick.com](#)
Subject: Re: NYT - OpenAI's Document Productions
Date: Tuesday, October 29, 2024 8:06:27 PM

EXTERNAL Email

Alex,

This is the first time you've ever raised this issue. We can meet and confer on it next week, after the court addresses the motion to compel your coworkers filed on a similar issue in the AG matter.

Andy

From: Alex Frawley <AFrawley@susmangodfrey.com>
Date: Monday, October 28, 2024 at 7:20 AM
To: KVP-OAI <KVPOAI@keker.com>, openaicopyrightlitigation.lwteam@lw.com <openaicopyrightlitigation.lwteam@lw.com>, OpenAICopyright@mofo.com <OpenAICopyright@mofo.com>
Cc: NYT-AI-SG-Service@simplelists.susmangodfrey.com <NYT-AI-SG-Service@simplelists.susmangodfrey.com>, dailynews-ai-rfem@rothwellfigg.com <DailyNews-AI-RFEM@rothwellfigg.com>, #NewYorkTimes-Microsoft-FDBR <NewYorkTimes-Microsoft-FDBR@faegredrinker.com>, NewYorkTimes_Microsoft_OHS@orrick.com <NewYorkTimes_Microsoft_OHS@orrick.com>
Subject: NYT - OpenAI's Document Productions

[EXTERNAL]

Counsel,

For the 26 custodians in this case, has OpenAI searched their text messages and social media messages for responsive documents? To be clear, by "text messages", we mean not only SMS text messages but also instant messaging applications such as WhatsApp, iMessage, and Signal. By "social media messages", we mean social media sites like [X.com](#) (formerly known as Twitter), Instagram, and Facebook.

Thank you.

Best,
Alex

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